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*Attorneys for Defendants  
RJCL Corporation and Ruel R. Villacrusis*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE  
NORTHERN MARIANA ISLANDS**

HONORIO G. CAMBRONERO, ) CIVIL ACTION NO. 08-0033  
Plaintiff, )  
vs. )  
RJCL CORPORATION dba RNV ) ANSWER AND JURY TRIAL  
CONSTRUCTION and RUEL R. ) DEMAND  
VILLACRUSIS, )  
Defendants. )

COMES NOW, Defendants RJCL Corporation and Ruel R. Villacrusis, by counsel, and for their Answer to the Complaint, respond as follows:

1. Defendants admit the allegations made in paragraphs 4, 8, 13, 16, 17, 18, 19, 43, 59, 60, 72, 73, 77, 83 and 89 of the Complaint.

2. Defendants deny the allegations made in paragraphs 1, 2, 3, 5, 6, 7, 9, 10, 11, 12, 13, 14, 15, 20, 21, 24, 25, 26, 31, 32, 33, 35, 36, 37, 40, 41, 42, 44, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 58, 61, 63, 64, 65, 66, 68, 69, 70, 74, 75, 78, 79, 80, 81, 84, 85, 86, 87, 90, 91, 92, 93, 94, 95, 96, 98, 99 and 100 of the Complaint.

3. Defendants are without sufficient information upon which to form a belief as to the truth or falsity of the allegations in paragraphs 22, 23, 27, 28, 29, 30, 34, 38, 39 and 45 of the Complaint and therefore deny the same on that basis.

4. With regard to paragraphs 62, 67, 71 76, 82, 89 and 97 Defendants deny all allegations not specifically admitted.

5. Defendants deny that Plaintiff is entitled to any of the relief prayed for.

6. Defendants deny each and every allegation not specifically admitted herein.

## AFFIRMATIVE DEFENSES

1. The Complaint fails to state a claim for which relief can be granted.

2. Plaintiff has unclean hands.

### 3. Estoppel.

4. Plaintiff's claims are in part or in full, time barred.

5. Plaintiff's claims are barred by the statute of limitations or the doctrine of laches.

6. Plaintiff has waived some or all of his claims.

7. Plaintiff lacks standing to present some or all of his claims.

8. Plaintiff has failed to exhaust his administrative remedies.

WHEREFORE, Defendants pray that Plaintiff take nothing by way of his Complaint and that judgment be entered against Plaintiff and in favor of Defendants and that Defendants be awarded their costs of defense, expenses, attorney fees, and such other legal and equitable relief as is appropriate.

## **DEMAND FOR JURY TRIAL**

Defendants hereby demand trial by jury on all claims made in the Complaint and all defenses raised herein.

1 Dated this 28<sup>th</sup> day of August, 2008.  
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O'CONNOR BERMAN DOTT & BANES  
Attorneys for RJCL Corp. and Ruel R. Villacrusis  
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MICHAEL W. DOTT  
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